

KMH/smv

RECEIVED

2024 DEC 27 A 11:20

U.S. COURT OF APPEALS
FOURTH CIRCUIT

Shelke Knox

12-26-2024

mailed by fedx next day

124-cv-001-26-BAT

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
1100 East Main Street, Suite 501, Richmond, Virginia 23219

December 13, 2024

RULE 45 NOTICE

No. 24-2141, Shelia Knox v. Amazon.com Services, LLC

1:24-cv-00126-BAH

TO: Shelia Knox

DEFAULT(S) MUST BE REMEDIED BY: 12/30/2024

Please take notice that the court may dismiss this case for failure to prosecute pursuant to Local Rule 45 unless the default(s) identified below are remedied within 15 days of the date of this notice through receipt of the requisite form(s) or fee in the appropriate clerk's office. Forms are available for completion as links from this notice and at the court's web site, www.ca4.uscourts.gov.

[✓] **Informal opening brief** must be received in the Court of Appeals clerk's office.

Kirsten Hancock, Deputy Clerk
804-916-2704

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

DIRECTIONS FOR INFORMAL BRIEF

1. **Preparation of Brief.** The Court will consider this case according to the written issues, facts, and arguments presented in the Informal Briefs. Space is provided to present up to four issues. Additional issues may be presented by attaching additional sheets. The Court will not consider issues that are not specifically raised in the Informal Briefs. Informal Briefs must be legible and concise, and any attached pages must be sequentially numbered. Informal Briefs may be filed on the form provided or in memorandum or formal briefing format.

2. **Copies required.**

- * File the original of the Informal Brief with the Court. If you would like a file-stamped copy returned, send an extra copy and a self-addressed stamped envelope. The Court's address is:

Clerk
U.S. Court of Appeals, Fourth Circuit
U.S. Courthouse Annex, 5th Floor
1100 East Main Street
Richmond, VA 23219

- * Send one copy of your Informal Brief to each of the parties in the case.

3. **Certificate of Service Required.** You must certify that you sent each of the other parties or attorneys complete copies of all documents you send the Court. Service on a party represented by counsel shall be made on counsel.

4. **Signature Required.** You must sign your Informal Brief and all Certificates of Service. If the Informal Brief is not signed, the case will be subject to dismissal under this Court's Local Rule 45.

DOCUMENTS ARE SCANNED INTO ELECTRONIC FORM AND POSTED TO
THE DOCKET. DO NOT USE STAPLES, TAPE OR BINDING.

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

INFORMAL BRIEF

RE: Sheila Knox v. Amazon.com Services,LLC 1:24-cv-00126-BAH

1. Declaration of Inmate Filing

An inmate's notice of appeal is timely if it was deposited in the institution's internal mail system, with postage prepaid, on or before the last day for filing. Timely filing may be shown by:

- a postmark or date stamp showing that the notice of appeal was timely deposited in the institution's internal mail system, with postage prepaid, or
- a declaration of the inmate, under penalty of perjury, of the date on which the notice of appeal was deposited in the institution's internal mail system with postage prepaid. To include a declaration of inmate filing as part of your informal brief, complete and sign the declaration below:

Declaration of Inmate Filing

I am an inmate confined in an institution. I deposited my notice of appeal in the institution's internal mail system on _____ [insert date]. First-class postage is being prepaid either by me or by the institution on my behalf.

I declare under penalty of perjury that the foregoing is true and correct (see 28 U.S.C. § 1746; 18 U.S.C. § 1621).

Signature: _____

Date: _____

2. Jurisdiction

Name of the court or agency from which you are appealing:

Edward A. Garmatz U.S District Court. Baltimore, Md 21201

Dates of the order or orders for which review is sought:

See Attachments

3. Issues for Review

Use the following spaces to set forth the facts and argument in support of the issues you wish the Court of Appeals to consider. The parties may cite case law, but citations are not required.

Issue 1.

See Attachments

Supporting Facts and Argument.
See Attachments

Issue 2.
See Attachments

Supporting Facts and Argument.
See Attachments

Issue 3.

Supporting Facts and Argument.

Issue 4.

Supporting Facts and Argument

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

INFORMAL BRIEF

1. B. Attachments for Dates of the order or orders for which review is sought;

On April 27th 2023 I filed a discrimination lawsuit with the EEOC. On July 12th 2023 I filed a Wrongful Workplace Termination lawsuit in the District Court for Baltimore City located at 501 East Fayette St Baltimore, MD 21201 which was set for November 6th 2023, do to the fact Amazon fired me for filing a Discrimination lawsuit with the EEOC. The Judge on that case had transferred it to the Honorable Judge Stephanie A. Gallagher. On September 6th 2023 I had written to The Honorable Judge Stephanie A. Gallagher explaining how I felt about the case and why it should not be thrown out due to the fact that Amazon said that, that wasn't their name. On September 19th The Honorable Judge SAG had written me back explaining to me that she had asked for the files on my case from the EEOC and that it was not quite 180 days and that the EEOC was still investigating my case and that she was dismissing this case without prejudice. On November 6th 2023 I had written the Honorable Judge Stephanie A. Gallagher asking her if she could reopen the case since she was the one who said that I could reopen it back up. On January 12th 2024 I was told by the The Honorable Judge SAG clerk that my case was transferred to Judge Brendan A. Hurson in Baltimore Maryland and to write to him and to explain to him how I felt about the case. On January 12th 2024 I had written to Judge Brendan A. Hurson, giving him the particulars of the case and explained how I felt about the case. On January 23 2024 I had written to Judge Brendan A. Hurson again, explaining the laws about Discrimination and Retaliation in the workplace. On October 3rd 2024 I had written to The Honorable Stephanie A. Gallagher and Judge Brendan A. Hurson explained that The Honorable Judge Stephanie A. Gallagher had left the case open and dismissed it without prejudice.

On around October/ November 2024 I responded to Amazon's motion to dismiss, if it wasn't for Amazon's Lawyer sending me the dismissal information I wouldn't have known about the dismissal.

3. Issues for Review

Issue 1. Judge Brendan A. Hurson never responded to my complaint, motions or letters, just ignored them right out, and by doing so, the judge didn't allow me the proper due process under the law, to have a right to a fair trial/ hearing all because I'm representing myself as Pro-se.

Supporting Facts and Arguments:

The code of conduct for United States Judges includes the ethical canons that apply to federal judges and provides guidance on their performance of their official duties. **Canon 1.** A Judge should uphold the integrity and independence of the judiciary. **Canon 2.** A Judge Should Avoid Impropriety and the Appearance of Impropriety in All Activities. **Canon 3.** A Judge Should Perform the Duties of the Office Fairly, Impartially and Diligently. Judge Brendan A. Hurson did not read my original complaint, the motions, the letters, or the case file that the court had sent over for him to review. Instead Judge Brendan A. Hurson just threw it out on the Appellees (Amazon's) word, not allowing me my civil rights to a fair trial. **Legal Obligation:** Most Jurisdictions have laws mandating that Judges must provide some level of assistance to individuals without legal counsel, particularly in complex legal matters. **Fairness principle:** The court system is designed to ensure a fair hearing for all parties. Judge Brendan A. Hurson denied me of that.

Issue 2. Judge Brendan A. Hurson dismissed my case without doing his diligence, because Amazon said that's not their address, and he believed them, even when they still received the mail or the judge didn't care either way

Supporting Facts and Arguments:

A federal Judge who practices in the state of Maryland or any other state, should be familiar with the state law's that they are practicing in, at one point a Judge starts off a district court judge then to the circuit courts from there appellate to supreme to the united states district court to the united states supreme court. Federal law states **Federal Rule of Civil Procedure Rule 5(b)** allows service by mail by mailing it to the person's last known address- in which event service is. Service by mail (**Rule 4(e)(1)**) - Service by mail involves sending a copy of the summons and complaint to the defendant's last known address. **Maryland Rule 1-321. Service of Pleadings** Service upon the attorney or upon a party shall be made by delivery of a copy or by mailing it to the address most recently stated in a pleading or paper filed by the attorney or party, or if not stated, to the last known address. Amazon's Attorney said that wasn't there address, then they should of had notified the courts of a change of address but they didn't, but if Judge B A. Hurson did his diligence, would we have been here today? YES, because I'm representing myself, once The Honorable Judge S A.G transferred my case over to the new Judge, Judge B A.H it was already doomed. When a judge ignores federal procedures, it is considered **judicial misconduct**; this means the judge is not following the established rules and guidelines set forth for federal courts, potentially impacting the fairness and integrity of a case by making decisions

without proper legal basis or due process. **Key points about judicial misconduct:**

Code of Conduct: Federal judges are expected to abide by the Code of of Conduct* which outlines ethical standards and proper procedures they must follow. Judge BAH found favor for the defendants and dismissed my case without even knowing the case or the federal mail processing laws, as a sitting U.S Judge, if he did that to me, how many others are there, in a era of deep structural inequality in terms of class, beliefs and orientation being blind to these power structures as a Judge is just reinforcing and accepting these inequalities this is a serious matter, this about Discrimination, Retaliation and Wrongful Workplace Termination. Judge Brendan A. Hurson is not blind he just chose to be blind by ignoring the rule of law. The US Constitution Article III states hold their office during good behavior. How can we give full faith and credit to someone who ignores the law **Acts of misconduct:** A judge can be removed for misconduct, maladministration, or incompetence.

4. Relief Requested

I'm asking for the max that this court can give, the max that the EEOC gives is 300,000 for A company that has over 500 employees Which covers Compensatory damages can include Lost pay, including salary, bonuses, stock options vacation leave, healthcare costs and pension payments,

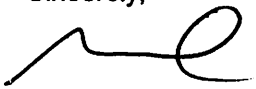
- 1. Back pay:** I'm asking for back pay for lost of earnings as result of the discrimination, from the date of the discriminatory act to the date of the settlement, or in the plaintiff's favor.
- 2. Front pay:** lost earnings as the result of the discrimination. (I haven't work since then I'm on Disability now).
- 3. Lost benefits:** when Amazon fired me I had to use my 401k plan to help me pay bills.

4. Punitive damages. After I filed an EEOC complaint Amazon fired me.

5. Damages for Emotional Distress, now I'm back on my psychic medication three times a day, for manic depression and anxiety, when I was doing good, Amazon BWI2 facility has over 500 employees.

6. Retaliation: After I had filed the EEOC complaint on June 16th 2023 Amazon fired me alleging that I had passed a car in the parking lot, that was the day that Amazon ask the EEOC for an extension, I'm asking for the max that this court can give for retaliation without cause.

Sincerely;

A handwritten signature in black ink, appearing to read 'Sheila Knox', with a stylized, flowing script.

Sheila Knox

inovativekutz@gmail.com
202-763-0004

Date 26th 2024

4. **Relief Requested**

Identify the precise action you want the Court of Appeals to take:
See Attachments

5. **Prior appeals (for appellants only)**

A. Have you filed other cases in this court?

☐ Yes

☒ No

B. If you checked YES, what are the case names and docket numbers for those appeals and what was the ultimate disposition of each?



Signature

[Notarization Not Required]

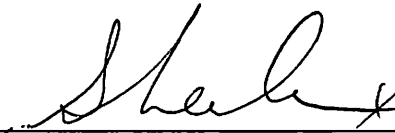
Sheila Knox

[Please Print Your Name Here]

CERTIFICATE OF SERVICE

I certify that on 12/26/2024 I served a complete copy of this Informal Brief on all parties, addressed as shown below:

Ms Gilda Bethany Ingle
LITTLER MENDELSON PC
1800 Tyson Boulevard Suite 500



Signature

NO STAPLES, TAPE OR BINDING PLEASE

EXPRESS

ORIGIN ID:ODMA (202) 763-0004
SHEILA KNOX

ACTWGT: 0.30 LB
CAD: 6571059/ROSA2570

118 N HOWARD ST
APT 816
BALTIMORE, MD 21201
UNITED STATES US

TO CLERK U.S COURT OF APPEALS 4TH CIR
US COURTHOUSE ANNEX, 5TH FLOOR
1100 E MAIN ST

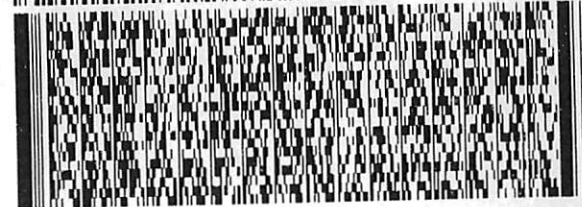
RICHMOND VA 23219

(000) 000-0000

REF:

INV:

DEPT:



FedEx
Express



J244024051001 01

Envelope
Recycle me.

TRK# 7710 4005 4110
0201

XP GVEA

FRI - 27 DEC 12:00P
PRIORITY OVERNIGHT

ASR
23219

VA-US RIC

